

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

|                                   |   |   |
|-----------------------------------|---|---|
| <b>ROVIO ENTERTAINMENT, LTD.</b>  | § |   |
| <b>Plaintiff,</b>                 | § |   |
|                                   | § |   |
| <b>v.</b>                         | § | <b>CIVIL ACTION NO. 3:13-cv-04719-G</b> |
|                                   | § |   |
| <b>AM WHOLESALE, INC., et al.</b> | § |   |
| <b>Defendant.</b>                 | § |   |
|                                   | § |   |

**PLAINTIFF'S ANSWER TO COUNTERCLAIMS OF AM WHOLESALE, INC., ALI RAVJANI, AMAFHH INTERNATIONAL, INC., AMAFHH CENTER INC. and MOSHIN RAVJANI**

Plaintiff and Counter-defendant, Rovio Entertainment, Ltd. (“Rovio” or “Plaintiff”), by its undersigned counsel, hereby reply to the Counterclaims of Counter-Plaintiffs (identified above), as follows:

**I. ANSWERS**

102. No response is required or possible.
103. Denied.
104. Denied.
105. Denied.
106. Denied.
107. Denied.
108. Denied.

**II. AFFIRMATIVE DEFENSES**

**First Affirmative Defense**

The counterclaims do not state a claim against Plaintiff upon which relief can be granted.

**Second Affirmative Defense**

Counter-Plaintiff's claims are barred as a result of unclean hands.

**Third Affirmative Defense**

Counter-Plaintiff, through its own actions, conduct, or failure to act, waived any right to relief.

**I. PRAYER FOR RELIEF**

WHEREFORE, Plaintiff, request that this Court enter judgment:

1. That the Counterclaims be dismissed with prejudice;
2. That Plaintiff be awarded their costs and disbursements in this action, together with attorneys' fees;
3. That this Court award Plaintiff such other and further relief as it may deem appropriate in this circumstance.

Dated: July 8, 2014

Respectfully submitted,

BY: *s/ Jason M. Drangel*  
**EPSTEIN DRANGEL LLP**  
Jason M. Drangel  
Ashly E. Sands  
60 East 42<sup>nd</sup> Street, Suite 2410  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
E-mail: mail@ipcounselors.com

*Attorneys for Plaintiff  
Rovio Entertainment, Ltd.*

Steven M. Abbott  
State Bar No. 00797825  
Federal I.D. No. 9027  
2727 Allen Parkway, Suite 1675  
Houston, Texas 77019  
Telephone: (713) 467-1669  
Facsimile: (713) 467-4936  
E-mail: [abbottsteven@hotmail.com](mailto:abbottsteven@hotmail.com)

*Attorneys for Plaintiff  
Rovio Entertainment, Ltd.*

Dean M. Fuller  
State Bar No. 07516550  
Law Office of Dean M. Fuller  
5001 Spring Valley Road  
1000 Providence Towers East  
Dallas, Texas 75244  
Telephone: (972) 934-4138  
Facsimile: (972) 934-4140  
E-mail: deanfuller@fullerlaw.net

*Local counsel for Plaintiff  
Rovio Entertainment, Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2014, I electronically filed the above and foregoing document with the Clerk of this Court using the CM/ECF filing system, and that service of a true and complete copy of this document upon all parties through their respective counsel of record, who are known Filing Users, was automatically accomplished through electronic Notice of the filing of this document. On this date I also provided true and correct copies of this document to all parties through their respective counsel of record via email addressed as follows:

**Robert J Clary**

Owens Clary & Aiken LLP  
700 N Pearl St, Suite 1600  
Dallas, TX 75201  
214/698-2102  
214/698-2121 (fax)  
[rjclary@oca-law.com](mailto:rjclary@oca-law.com)

*ATTORNEY FOR DEFENDANTS* BG Traders LLC; Bangshi Gopal Shrestha; Vania Jewelry LLC; and Meishu Jin

**Aaron P Peacock**

Gagnon, Peacock & Vereeke, P.C.  
Highland Park Tower, Second Floor  
4245 N Central Expressway  
Suite 250  
Dallas, TX 75205  
214/824-1414  
214/824-5490 (fax)  
[aaron@gapslaw.com](mailto:aaron@gapslaw.com)

*ATTORNEY FOR DEFENDANTS* AM Wholesale Inc.; Amafhh Center Inc.; Amafhh International Inc.; Ali Raza Ravjani; and Mohsin Raza Ravjani

**James A Pikl**

Scheef & Stone LLP  
2601 Network Boulevard  
Suite 102  
Frisco, TX 75034  
214/472-2100  
214/472-2150 (fax)  
[jim.pikl@solidcounsel.com](mailto:jim.pikl@solidcounsel.com)

*ATTORNEY FOR DEFENDANT* Roghan Etux Sangita Sthapit

**Steven T Polino**

Law Offices of Steven T Polino PLLC

3216 Prince Court

Bedford, TX 76021

817/992-6359

817/283-1182 (fax)

stplaw@sbcglobal.net

*ATTORNEY FOR DEFENDANTS* Assured Vending LLC and Discount Arcade Distributing Inc.

**Jade Marie Rozell-Ruiz**

Stanley & Associates PLLC

811 S Central Expressway

Suite 442

Richardson, TX 75080

214/570-4944

214/540-4561 (fax)

jade@stanley-lawfirm.com

*ATTORNEY FOR DEFENDANTS* DM Merchants Ventures Inc.; Xiao Dong Zhu; Yanagi Trading LLC; and Yuanli Tang

New York, New York

By:s/ Ashly E. Sands

Ashly E. Sands

60 East 42<sup>nd</sup> Street, Suite 2410

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391

E-mail: mail@ipcounselors.com

*Attorney for Plaintiff*